

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 04-11935-DPW
)	
ANDREA CABRAL, SUFFOLK)	
COUNTY SHERIFF'S DEPARTMENT,)	
SUFFOLK COUNTY, and)	
CORRECTIONAL MEDICAL)	
SERVICES, INC.,)	
)	
Defendants.)	

**PLAINTIFF SHEILA PORTER'S
ASSENTED TO MOTION TO IMPOUND HER
OPPOSITION TO DEFENDANTS' MOTION TO QUASH**

Plaintiff Sheila Porter submit this assented-to motion to impound her opposition to defendants' motion to quash ("opposition"). Impoundment is necessary because the opposition contains references to, and attaches copies of, documents produced by defendants that have been designated as "Confidential" under the terms of the Protective Order (attached as Exhibit A). By making this motion, Mrs. Porter in no way concedes that the documents were properly designated as "Confidential," but merely complies with the Protective Order.

Respectfully Submitted,

SHEILA J. PORTER,

By her attorneys,

/s/ Joseph F. Savage, Jr.

Joseph F. Savage, Jr. (BBO #443030)

David S. Schumacher (BBO #647917)

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Dated: June 29, 2005

LOCAL RULE 7.1A(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), counsel for Mrs. Porter conferred with counsel for defendants Andrea Cabral, Suffolk County Sheriff's Department, and Suffolk County in a good faith effort. Counsel for defendants Andrea Cabral, Suffolk County Sheriff's Department, and Suffolk County assents to the motion.

/s/ David S. Schumacher

David S. Schumacher

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